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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 Plaintiff,

v.

18 ROSARIO ZAMORA ROJO,
19 LEONARDO FLORES BELTRAN, and
20 SANDRO ESCOBEDO,

21 Defendants.

CASE NO. 2:21-CR-0007-DAD

STIPULATION AND ORDER TO CONTINUE
MOTIONS HEARING AND BRIEFING
SCHEDULE

22
23 STIPULATION

24 By this stipulation, Plaintiff, the United States of America, by and through its attorney of record,
25 Assistant U.S. Attorney David W. Spencer, and Defendants Rosario Zamora Rojo, Leonardo Flores
26 Beltran, and Sandro Escobedo, by and through their attorneys of record, hereby request to continue the
27 motions hearing set for January 13, 2025, and the accompanying briefing schedule, as follows:

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1. On December 12, 2024, defendant Zamora Rojo filed pre-trial motions set for hearing on
29 January 13, 2025. *See ECF 591, ECF 592.*
 2. Based on a previous stipulation of the parties, the deadline for the government's
30 oppositions was set for December 30, 2024, and the deadline for any reply briefs was set
31 for January 6, 2025. *See ECF 595.*

3. The parties have been engaged in plea discussions and believe they are close to finalizing an anticipated resolution. If resolution is reached, the parties anticipate requesting a change of plea hearing on January 13, 2025.
4. On December 30, 2024, and December 31, 2024, defendants Sandro Escobedo and Leonardo Flores Beltran filed joinders in Zamora Rojo's motion to suppress filed at ECF 592. *See* ECF 602 (Escobedo joinder), ECF 603 (Flores Beltran joinder).
5. The parties hereby jointly stipulate and request that the January 13, 2025 hearing on defendants' pretrial motions (ECF 591, 592, 602, and 603) shall be continued to February 3, 2025. The parties further stipulate and request that the government's oppositions shall be due on January 20, 2025, and any replies shall be due on January 27, 2025.¹

IT IS SO STIPULATED.

Dated: January 6, 2025

PHILLIP A. TALBERT
United States Attorney

/s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

Dated: January 6, 2025

/s/ Shari Rusk
Shari Rusk
Counsel for Defendant
ROSARIO ZAMORA ROJO

Dated: January 6, 2025

/s/ Christopher Cosca
Christopher Cosca
Counsel for Defendant
LEONARDO FLORES BELTRA

¹ By agreeing to this briefing schedule, the government does not waive, and explicitly preserves its position that defendants' motions are untimely and should be denied on that basis alone. The Court ordered all pretrial motions to be filed by November 19, 2024. ECF 506. As the government will further argue in its opposition briefing, its position is that the defendants have not shown good cause for the untimely filing of their pretrial motions, and thus the motions should be summarily denied. See Fed. R. Crim. P. 12(c).

1 Dated: January 6, 2025

/s/ Michael Heumann
Michael Heumann
Counsel for Defendant
SANDRO ESCOBEDO

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ORDER

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10 Pursuant to the stipulation of the parties and good cause appearing, the motions hearing set for
11 January 13, 2025, at 9:30 a.m., for the motions docketed at ECF 591, 592, 602, and 603, is hereby
12 continued to February 3, 2025 at 9:30 a.m. The government's oppositions shall be due on January 20,
13 2025, and any replies shall be due on January 27, 2025.

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IT IS SO ORDERED.

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16 Dated: January 7, 2025

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE

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